

Message

From: Ex. 6 Personal Privacy (PP)
Sent: 7/28/2021 12:02:46 PM
To: Ex. 6 Personal Privacy (PP)
Subject: RE: TSCA PMN Case Number P-20-0044

Ex. 6 Personal Privacy (PP)

Thank you...all good points...I agree with your approach/thinking about it.

I would like to respond at some point, but can wait a bit....

Regards,

Ex. 6 Personal Privacy (PP)

US EPA

Ex. 6 Personal Privacy (PP)

Office of Chemical Safety and Pollution Prevention (OCSP)
Office of Pollution Prevention and Toxics (OPPT)
New Chemicals Division (NCD)
1200 Pennsylvania Ave, NW
Washington, DC 20460

Ex. 6 Personal Privacy (PP)

From: Ex. 6 Personal Privacy (PP)
Sent: Wednesday, July 28, 2021 7:39 AM
To: Ex. 6 Personal Privacy (PP)
Subject: RE: TSCA PMN Case Number P-20-0044

Ex. 6 Personal Privacy (PP)

Ex. 5 Deliberative Process (DP)

Ex. 6 Personal Privacy (PP)

New Chemicals Division
USEPA/OCSP/OPPT

Ex. 6 Personal Privacy (PP)

From: Ex. 6 Personal Privacy (PP)

Sent: Wednesday, July 28, 2021 6:40 AM

To: Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Subject: FW: TSCA PMN Case Number P-20-0044

All:

I would like to respond to Pam because I know her. Seems to me that Ex. 6 Personal Privacy (PP) has done the right thing with her messaging and this is the fallout. I am guessing that Pam will go to the next level (Ex. 6 Personal Privacy (PP) or higher?) soon....

My draft response is:

Pam:

Ex. 5 Deliberative Process (DP)

Regards,

Ex. 6 Personal Privacy (PP)

US EPA

Ex. 6 Personal Privacy (PP)

Office of Chemical Safety and Pollution Prevention (OCSPP)

Office of Pollution Prevention and Toxics (OPPT)

New Chemicals Division (NCD)

1200 Pennsylvania Ave, NW

Washington, DC 20460

Ex. 6 Personal Privacy (PP)

From: Spencer, Pamela (PJ) <PJSpencer@ANGUS.com>

Sent: Tuesday, July 27, 2021 4:40 PM

To: Ex. 6 Personal Privacy (PP)

Subject: FW: TSCA PMN Case Number P-20-0044

Hi Ex. 6 Personal Privacy (PP)

I hope this email finds you well and that you have been enjoying the summer months.

I am reaching out to you to see if you can provide me with some additional clarity around the expected timing of our TSCA PMN Case Number P-20-0044. We have been working through the process for over a year now. We submitted data requested of as a part of a testing consent order in June. Recently, Ex. 6 Personal Privacy (PP) indicated that the current priorities focus on initial risk assessments of new cases and that it would take many months to get our updated risk

assessment. Many months is very nebulous timing. Is there a more definitive timeline you can share to help guide our planning?

At this point, our team is almost ready to abandon investments in new product development due to what appears to be insurmountable regulatory hurdles. Any help you can provide to give them some sense that there is a light at the end of the tunnel would be very helpful.

A sincere thank you in advance for your help.

Pam

Pamela J. Spencer, Ph.D., D.A.B.T.

Senior Vice President of Regulatory, Product Stewardship & Quality

ANGUS Chemical Company

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From: [REDACTED] **Ex. 6 Personal Privacy (PP)**

Sent: Monday, June 7, 2021 3:23 PM

To: Spencer, Pamela (PJ) <PJSpencer@ANGUS.com>

Subject: RE: TSCA PMN Case Number P-20-0044

"This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments."

Hi Pam,



I am sorry for the late response. I did find the OECD 201 study and I have provided all of the new information to the risk assessors to update their reports. There is no timeline for returned upfront testing and the current priority is the initial risk assessments for new cases. Unfortunately, I expect that it will take many months to get an updated risk assessment. I will let you know once it is being worked on. Please let me know if you have any questions or concerns.

Best regards,

Ex. 6 Personal Privacy (PP)

U.S. Environmental Protection Agency
Office of Chemical Safety and Pollution Prevention
Office of Pollution Prevention and Toxics
New Chemicals Division
Risk Management Branch 1

Ex. 6 Personal Privacy (PP)

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WARNING - Do not e-mail any Confidential Business Information (CBI) to EPA

From: Spencer, Pamela (PJ) <PJSpencer@ANGUS.com>
Sent: Wednesday, May 26, 2021 10:22 AM
To: Ex. 6 Personal Privacy (PP)
Subject: RE: TSCA PMN Case Number P-20-0044

Hi Ex. 6 Personal Privacy (PP)

I just uploaded the OECD 201 study again. Please let me know if you received it.

Also, yes, I added 7 additional attachments in addition to the OECD 201. The PMN was updated to reconcile the appropriate volumes per market application. I also added an updated process block diagram.

Can you let me know the timing now that the required studies have been submitted?

Thank you!

Pam

From: Ex. 6 Personal Privacy (PP)
Sent: Tuesday, May 25, 2021 4:50 PM
To: Spencer, Pamela (PJ) <PJSpencer@ANGUS.com>
Subject: RE: TSCA PMN Case Number P-20-0044

"This message is from an EXTERNAL SENDER - be CAUTIOUS, particularly with links and attachments."
Hi Pam,

Thank you for letting me know. It looks like the OECD 201 did not attach correctly. Can you please try to attach it again? I want to confirm that you have updated the PMN form and added 7 attachments for us to review (not including the missing OECD 201 or sanitized versions) to make sure I have not missed something.

Thank you,

Ex. 6 Personal Privacy (PP)

U.S. Environmental Protection Agency
Office of Chemical Safety and Pollution Prevention
Office of Pollution Prevention and Toxics
New Chemicals Division
Risk Management Branch 1

Ex. 6 Personal Privacy (PP)

⚠ Please do not print this email unless absolutely necessary ⚠

WARNING - Do not e-mail any Confidential Business Information (CBI) to EPA

From: Spencer, Pamela (PJ) <PJSpencer@ANGUS.com>
Sent: Monday, May 24, 2021 2:02 PM
To: Ex. 6 Personal Privacy (PP)
Subject: TSCA PMN Case Number P-20-0044

Hi Ex. 6 Personal Privacy (PP)

I hope you are doing well.

I reaching out to you to let you know that I have updated our PMN submission to include the completed ecotoxicity studies required by the testing consent order. I have also provided the supplemental information requested during our teleconference last December. The air emissions study on the chemical analogue of DMMOPA was not able to be modified so I submitted this without the cover page. I hope this will be OK.

I believe that you should now have all of the additional information needed to restart your evaluation process.

Please don't hesitate to reach out to me with any questions and I truly appreciate yours and the teams patience during this process.

Best regards,

Pam

Pamela J. Spencer, Ph.D., D.A.B.T.

Vice President of Regulatory, Product Stewardship & Quality

ANGUS Chemical Company

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